

APPENDIX F

DISCOVERY PLAN WORKSHEET

Tier I Pre-Settlement Discovery

Deadline for completion of Rule 26(a) initial disclosures and HIPAA-complaint records authorizations:	N/A
Completion date for Phase I Discovery as agreed upon by the parties: <i>(Reciprocal and agreed upon document production, generally not including depositions, unless otherwise agreed. No more than 30 days after Initial Conference)</i>	N/A
Status conference TBD by the court: <i>(Generally 15 days post Tier I Discovery)</i>	N/A

Tier II Discovery and Motion Practice

Motion to join new parties or amend the pleadings: <i>(Presumptively 15 days post status conference)</i>	N/A
First requests for production of documents and for interrogatories due by: <i>(Presumptively 15 days post joining/amending)</i>	10/15/2020
All fact discovery completed by: <i>(Presumptively 3.5 months post first requests for documents/interrogatories)</i>	1/31/2021
Exchange of expert reports completed by: <i>(Presumptively 30 days post fact discovery)</i>	Plaintiff to submit by 2/28/2021 Defendants to submit by 3/31/2021
Expert depositions completed by: <i>(Presumptively 30 days post expert reports)</i>	4/30/2021
Final date to take first step in dispositive motion practice: <i>(Parties are directed to consult the District Judge's individual rules regarding such motion practice. Presumptively 30 days post expert depositions)</i>	6/30/2021
<u>COMPLETION OF ALL DISCOVERY BY:</u> <i>(Note: Presumptively 9 months after Initial Conference.)</i>	5/30/2021

Submission of joint pre-trial order:	_____
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Final Pre-Trial Conference TBD by the court:	_____
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